

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

MULLEN AUTOMOTIVE, INC. and ULYSSES  
NOVOA,

Plaintiffs,

v.

TD AMERITRADE, INC., CHARLES SCHWAB  
& CO., INC., NATIONAL FINANCIAL  
SERVICES, LLC and JOHN DOES 1 THROUGH  
10,

Defendants.

Case No. 1:23-cv-07647-AT

**AFFIDAVIT OF DAVID LUGER IN  
SUPPORT OF MOTION FOR ADMISSION PRO HAC VICE**

STATE OF ILLINOIS            )  
  )  
COUNTY OF COOK            )

I, DAVID LUGER, being duly sworn, depose and say:

1. I am a member of the law firm of Katten Muchin Rosenman LLP. I submit this affidavit in support of my motion for admission *pro hac vice* to the bar of this Court in accordance with Local Civil Rule 1.3(c).

2. I have been retained as counsel for Defendants TD Ameritrade, Inc. and Charles Schwab & Co., Inc. in the above-captioned action. I respectfully request permission to appear *pro hac vice* on behalf of TD Ameritrade, Inc. and Charles Schwab & Co., Inc. I am familiar with this action and will be fully prepared to represent TD Ameritrade, Inc. and Charles Schwab & Co., Inc. in all proceedings before this Court.


3. As shown in the Certificate of Good Standing annexed hereto, I am a member in good standing of the bar of the State of Illinois (State Bar No. 6299381).

4. I have never been convicted of a felony.


5. I have never been censured, suspended, disbarred or denied admission or readmission by any court.

6. There are no disciplinary proceedings presently against me in any state or federal court.

WHEREFORE, I, David Luger, hereby respectfully request that this Court grant my admission *pro hac vice* to appear for all purposes as counsel for TD Ameritrade, Inc. and Charles Schwab & Co., Inc. in the above-captioned action.

  
\_\_\_\_\_  
David Luger

Sworn to me this 14 of September, 2023

  
\_\_\_\_\_  
Veronica Moncada



## **Certificate of Admission To the Bar of Illinois**

I, Cynthia A. Grant, Clerk of the Supreme Court of Illinois, do hereby certify that

David Luger

has been duly licensed and admitted to practice as an Attorney and Counselor at Law within this State; has duly taken the required oath to support the CONSTITUTION OF THE UNITED STATES and of the STATE OF ILLINOIS, and also the oath of office prescribed by law, that said name was entered upon the Roll of Attorneys and Counselors in my office on 11/05/2009 and is in good standing, so far as the records of this office disclose.

IN WITNESS WHEREOF, I have hereunto  
subscribed my name and affixed the  
seal of said Court, this 12th day of  
September, 2023.

*Cynthia A. Grant*

Clerk,  
Supreme Court of the State of Illinois